

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Sherwin-Williams Plant Fire Response - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #10
Progress
Sherwin-Williams Plant Fire Response
A6WT
Garland, TX
Latitude: 32.9080210 Longitude: -96.6667990

To: Craig Carroll, Region 6
Brendan Roache, OEM
Anthony Buck, TCEQ

From: Eric Delgado, FOSC

Date: 8/16/2023

Reporting Period: 8/16/2023

1. Introduction

1.1 Background

Site Number:	A6WT	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/7/2023	Start Date:	8/7/2023
Demob Date:		Completion Date:	
CERCLIS ID:	TXN000622299	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA emergency response with Potentially Responsible Party (PRP) oversight at a paint manufacturing facility.

1.1.2 Site Description

1.1.2.1 Location

The incident occurred at an active paint manufacturing facility in Garland, Texas. The facility is located within a primarily commercial/industrial area at 701 South Shiloh Road, Garland, Dallas County, Texas 75042 (Site). A large residential neighborhood is located approximately 0.25 miles southeast of the Site. Two bodies of water, Stream 2C4 and Duck Creek, flow through the residential neighborhood.

1.1.2.2 Description of Threat

The following table provides chemicals that were potentially released from the facility:

Hydrogen Cyanide	Ammonia	Ethylene glycol	n-Butyl acrylate
PFAS	Ammonium hydroxide	Ethylene glycol monoethyl ether	Nonylphenoxypoly(ethoxy)ethanol
1,2,4-Trimethylbenzene	Ammonium persulfate	Ethylene glycol monophenyl ether	o-Xylene
1,4-Dioxane	Benzene	Ethylene oxide	Pentadecafluorooctanoic acid (PFAO)
1-Butanol	Bisphenol A	Formaldehyde	Propylene oxide
2-Butoxyethanol	Cumene	Formic acid	Sodium nitrate
2-Pentanone, 4-methyl-	Cyclohexane	Hexachlorobenzene	Styrene
2-Phenoxyethanol	Dibenzoyl peroxide	Hexamethylene diisocyanate	Tert-Butyl alcohol
4,4-Methylenediphenyl diisocyanate	Diethanolamine	Hydroquinone	Toluene
4-Nonylphenol, branched and linear, ethoxylated	Diethylene glycol monobutyl ether	Isocyanic acid, polymethylenepolyphenylene ester	Triethylamine
Acetaldehyde	Diethylene glycol monoethyl ether	Methyl alcohol	Xylenes
Acrolein	Epichlorohydrin	Methyl methacrylate	Zinc pyrrhione
Acrylamide	Ethyl acrylate	Naphthalene	
Acrylic Acid	Ethylbenzene	Naphthenic acids, zinc salts	

The facility was unable to shutoff the fire suppression system during the incident which resulted in the release of an unknown amount of aqueous film-forming foam (AFFF) and firewater into storm drains that discharged into Stream 2C4. Stream 2C4 flows into Duck Creek which ultimately flows into the East Fork of the Trinity River. The EPA and TCEQ have received odor complaints from residents.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA, TCEQ, and Sherwin Williams continue to operate in Unified Command to accomplish the following incident objectives:

- (1) Conduct all field activities in a manner to ensure health and safety following the HASP.
- (2) Identify critical resource needed by the Incident Command and field personnel.
- (3) Establish Emergency Response procedures to accomplish the following:
 - a. Ensure the safety of the public and responders.
 - b. The RP is collecting multimedia samples at the Site and downstream of the Site.
- (4) Utilize EPA GeoPlatform dashboards to track Site operations.
- (5) Set up and maintain daily calls with local downstream municipalities.

2.1.2 Response Actions to Date

The following contaminants were found in Stream 2C4 and Duck Creek between 8/7/2023 and 8/10/2023: antimony, lead, manganese, benzene, n-butanol, and 1,4-Dioxane. Only lead and n-butanol were found on multiple occasions during this time period. Lead was the only contaminant found above site-specific screening levels during the 8/11/2023 and 8/12/2023 sampling efforts. Lead and 1,4-Dioxane were detected above site-specific screening levels during the 8/13/2023 sampling efforts; however, 1,4-Dioxane was not detected in the duplicate quality control sample collected at the same time and location. The exceedance of 1,4-Dioxane was detected from a sample collected downstream of the dam locations. Due to the difference in the sample and the quality control sample and the location, the 1,4-Dioxane exceedance appears to be a false positive and is not representative of site conditions. No PFAS compounds were found above site-specific screening levels from samples collected in impacted waterways between 8/7/2023 and 8/13/2023. There were no recorded exceedances for site-specific Contaminants of Concern for 8/9/2023 and 8/10/2023. EPA continued providing oversight and documentation of Sherwin Williams containment and recovery efforts and surface water sampling efforts. Sampling is ongoing at 10 fixed locations in Duck Creek spanning 53 river miles into the Trinity River.

A Flushing Plan for Stream 2C4 was approved on August 16, 2023. A Preliminary Air Sampling and Analysis Plan was approved on August 16, 2023.

TCEQ continues to monitor cleanup activities, dam integrity, and review of sample results.

Texas Parks and Wildlife visited several locations to observe cleanup and wildlife response activities along Duck Creek and Stream 2C4. During the visits, there were no impacted fish or wildlife observed.

As of 8/16/2023, Texas Parks and Wildlife has documented that 1,088 animals were killed as a result of the release.

Sherwin Williams continued the recovery process of AFFF impacted waters at the Wynne Park dam location and conducted community air monitoring near the dam location. No volatile organic compound (VOC) readings above instrument detection limits were observed in the nearby community. Sherwin Williams ceased recovery efforts at a second location downstream of the Wynne Park dam location based on recommendations by EPA and TCEQ. Sherwin Williams will initiate flushing and washing activities of Stream 2C4 at the recommendation of EPA. Sherwin Williams continues pumping water downstream of the Wynne Park dam location. Sherwin Williams also continued door-to-door requests to obtain right of entry agreements from property owners and obtained approximately 60 agreements to date. Sherwin Williams continued drone operations to collect aerial imagery.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Potentially Responsible Party (PRP) is Sherwin Williams.

2.1.4 Progress Metrics:

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
AFFF/Firefighting water	Water/Product Mixture	~1,500,000 gallons	Various	N/A	

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

EPA, TCEQ, and Texas Parks and Wildlife will remain on-site to oversee and document Sherwin Williams' containment and recovery efforts, sampling operations, and wildlife impact assessment efforts.

Sherwin Williams will continue recovery efforts using vacuum trucks and frac tanks to recover AFFF fluids and firewater from impacted waterways. Sherwin Williams will flush and wash Stream 2C4 at the recommendation of EPA. Sherwin Williams will monitor the installation and maintenance of the containment structures (dams, berms, etc.). Sherwin Williams will continue to pump water downstream of the Wynne Park dam location. Sherwin Williams will continue community outreach efforts to obtain right of entries to access portions of Stream 2C4 and Duck Creek which run through residential properties.

CTEH and TCEQ will conduct air monitoring during the flushing event using handheld monitors for VOCs.

2.2.2 Issues

TCEQ and City of Garland continue to receive reports of odors coming from Stream 2C4. Sherwin Williams collected samples on 8/15/2023 and are pending analysis.

2.3 Logistics Section

No information to report.

2.4 Finance Section

2.4.1 Narrative

No information to report at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

No information to report.

2.5.2 Liaison Officer

Public Resources:

<https://response.epa.gov/SherwinWilliamsPlantFireResponse/> (EPA Response Website)

<https://www.garlandtx.gov/>
<https://sherwin-williams-plant-fire-response-epa.hub.arcgis.com/> (EPA Response Interactive Hub Site)
garlandresponse@sherwin.com (Sherwin-Williams incident email address)

2.5.3 Information Officer

No information to report.

3. Participating Entities

3.1 Unified Command

EPA, TCEQ, and Sherwin Williams will continue to operate in Unified Command.

3.2 Cooperating Agencies

EPA is working closely with the following federal, state and local agencies during this response: US Department of the Interior, US Fish and Wildlife Service, Texas Parks and Wildlife Department, TDEM, TCEQ, City of Garland, Dallas County Emergency Management, and the North Texas Municipal Water District.

4. Personnel On Site

- EPA FOSCs - 2
- EPA Toxicologist -1
- EPA PIO -1

- EPA START - 5
- TCEQ
- TDEM
- City of Garland Emergency Management
- Sherwin Williams
 - Miller Environmental
 - Center for Toxicology and Environmental Health (CTEH)
 - TAS Environmental
 - Cactus Environmental
 - Witt O'Brien's

5. Definition of Terms

above ground storage tank (AST)
aqueous film-forming foam (AFFF)
Airborne Spectral Photometric Environmental Collection Technology (ASPECT)
Center for Toxicology and Environmental Health (CTEH)
chemicals of concern (CoCs)
EPA Federal On-Scene Coordinator (FOSC)
Garland Fire Department (GFD)
Garland Police Department (GPD)
Liaison Officer (LNO)
meter (m)
particulate matter less than 2.5 micrometers in diameter (PM 2.5)
parts per million (ppm)
polyfluorinated compounds (PFCs)
Potentially Responsible Party (PRP)
Superfund Technical Assessment and Response Team (START)
Texas Commission of Environmental Quality (TCEQ)
Texas Parks and Wildlife Department (TPWD)
Unified Command (UC)
volatile organic compounds (VOCs)

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information may be obtained at response.epa.gov/SherwinWilliamsPlantFireResponse.

6.2 Reporting Schedule

A progress POLREP will be submitted as determined appropriate by the EPA OSC and a final POLREP will be submitted upon completion of the response.

7. Situational Reference Materials

No information available at this time.